

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

*In re:*

*Application of the Reporters Committee for  
Freedom of the Press for an Order Authorizing  
the Release of Grand Jury Material Cited,  
Quoted, or Referenced In the Report of Special  
Counsel Robert S. Mueller III*

Case: 1:19-mc-00045  
Chief Judge Beryl A. Howell

**JOINT MOTION TO STAY**

Pursuant to the Court’s Minute Order dated April 1, 2019, counsel for the government and the Reporters Committee for Freedom of the Press (the “Reporters Committee”) have met and conferred regarding a proposed briefing schedule. The parties jointly agreed to and hereby do move the Court to stay the entry of a briefing schedule on the Reporters Committee’s Application for 30 days, subject to requests to renew the stay further, in light of the anticipated release of the redacted Special Counsel’s Report and any filing of a petition for rehearing or rehearing *en banc* in *McKeever v. Barr*, No. 17-5149 (D.C. Cir. 2018), events that will inform the legal and factual circumstances of this proceeding.

The parties respectfully reserve the right to request that this Court lift the stay at any time and to propose a briefing schedule.

Dated: April 9, 2019

Respectfully submitted,

/s/ Elizabeth J. Shapiro

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**[PROPOSED] ORDER**

On consideration of the parties' Joint Motion to Stay, it is HEREBY:

**ORDERED** that the Joint Motion to Stay is GRANTED; and it is further

**ORDERED** that the entry of a briefing schedule on the Reporters Committee for Freedom of the Press's Application is stayed for 30 days, subject to requests to renew the stay further, in light of the anticipated release of the redacted Special Counsel's Report and any filing of a petition for rehearing or rehearing *en banc* in *McKeever v. Barr*, No. 17-5149 (D.C. Cir. 2018).

**SO ORDERED** on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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